



# Medical Marijuana Registry

4300 Cherry Creek Drive South, Denver, CO 80246-1530 • 303-692-2184

E-mail: [medical.marijuana@state.co.us](mailto:medical.marijuana@state.co.us) • Website: [www.cdphe.state.co.us/hs/medicalmarijuana](http://www.cdphe.state.co.us/hs/medicalmarijuana)

## Update for Medical Marijuana Centers ~ March 2012

The Medical Marijuana Registry supports Colorado citizens' medical care needs by administering a statewide program for legal access to medical marijuana. This newsletter provides a brief update on policies, procedures and activities at the Medical Marijuana Registry. For more details and to keep current, please visit the website often. For questions or comments, please contact us at 303-692-2184 or [medical.marijuana@state.co.us](mailto:medical.marijuana@state.co.us).

### Help reduce rejection rates and confidentiality breaches.

The Registry has noticed upward trends in rejection rates due to paperwork errors.

**Our Goal:** Reduce rejection rates to less than 10 percent.

### Medical Marijuana Centers can help reduce errors by observing the following:

1. **Verify all information with patients.** A significant number of rejections are due to application data errors. When completing paperwork with patients, please read information aloud to verify patient understands and confirms the information before signing. *One of the most common errors is that the social security number on forms does not match the number in our database.*
2. **Start fresh with each form.** Since the Registry released forms that can be completed electronically, we have seen an increase in applications with wrong patient information. In a few cases, patient information was breached because the paperwork for one patient had another patient's address on it. *To avoid this, please start with a blank form each time.*
3. **Use current forms.** New forms were released December 1, 2011. Modifications have been made to the forms in response to regulatory changes and the reduction of application fees effective January 1, 2012. *Please begin using these forms immediately.*
4. **Clearly complete all forms:** One of the most frequent reasons for delayed cards is inaccurate data entry due to unclear handwriting on forms. In particular, please make sure numbers are clearly distinguishable.
5. **Submit ONLY one patient's paperwork per envelope.** Per form instructions, the Registry must receive each patient's paperwork separately in order to track and process it appropriately.
6. **Ensure timely submission.** All forms, except the application, must be received by the Registry within 10 days of the notary's signature. The application must be received within 60 days of the physician's signature on the Physician Certification. Please advise patients of these time restrictions and encourage immediate submission.
7. **Reduce risk of patient 'center shopping'.** Patients may only submit one change of provider request per 30 days. Many patients are submitting multiple change requests per month. Please verify patients have not requested a change of medical marijuana center within the previous 30 days before processing new paperwork. Duplicate requests are rejected, increasing the potential that your client and plant counts may not be accurate and verifiable against the Registry's database.
8. **Verify patient proof of residency paperwork is complete.** The Registry requires that utility and cable bills include both the service address and the mailing address. Encourage patients to submit copies of paperwork including the payment coupon, which most often has their mailing address.
9. **Submit applications and changes to patient records separately.** Applications and Change to Patient Record forms are processed separately. Change forms are currently not processed on the same time-line as applications. Please ensure patient information is correct on the application before submission.
10. **Notarize as completed. DO NOT pre-date or pre-sign notary sections.** The application must be signed in front of the notary and completed at that time. When the patient's signature and notary's signature dates do not match, applications are rejected.
11. **Accurately notarize paperwork.** With the release of the new forms, there has been an increase of rejections due to incomplete or inaccurate notary sections. The most common error is that the date of the notary's signature does not match the patient's signature date. Another common error is that notaries are not signing the paperwork exactly as their notary seals list their names. Please be sure all blanks on the notary section are complete and accurate.



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12. **Use only State-registered notaries.** The Registry has recently received applications with notary seals from individuals who are not registered with the Secretary of State's office. Please be sure that all notaries working with your center are registered with the Secretary of State. To verify status, visit:  
[sos.state.co.us/NotaryPublic/verifyNotarySearch.do](http://sos.state.co.us/NotaryPublic/verifyNotarySearch.do).
13. **Do not include employee IDs.** If a patient designates a medical marijuana center as the provider, the Registry does not need an employee's ID. Ensure the center's name and address is complete on all forms.
14. **Send only relevant paperwork.** The Registry has been receiving copies of Medical Marijuana Enforcement Division forms along with patient change of patient records forms and applications. To ensure that all paperwork is quickly and accurately processed, please send only those pages and support documents required in the instructions for each form.

## Legislation Regarding Marijuana Purchase at Centers

**Effective July 1, 2011, Colorado Revised Statute 12-43.3-402. Medical marijuana center license has been amended as follows:**

(5) Prior to initiating a sale, the employee of the medical marijuana center making the sale shall *verify that the purchaser has a valid registration card issued pursuant to section 25-1.5-106, C.R.S., or a copy of a current and complete new application for the Medical Marijuana Registry administered by the Department of Public Health and Environment that is documented by a certified mail return receipt* as having been submitted to the Department of Public Health and Environment within the preceding thirty-five days, and a valid picture identification card that matches the name on the registration card. *A purchaser may not provide a copy of a renewal application in order to make a purchase at a medical marijuana center. A Purchaser may only make a purchase using a copy of his or her application from 8 a.m. to 5 p.m., Monday through Friday.* If the Purchaser presents a copy of his or her application at the time of purchase, the employee must contact the Department of Public Health and Environment to determine whether the purchaser's application has been denied. *The employee shall not complete the transaction if the purchaser's application has been denied.* If the Purchaser's application has been denied, the employee shall be authorized to confiscate the purchaser's copy of the application and the documentation of the certified mail return receipt, if possible, and shall, within seventy-two hours after the confiscation, turn it over to the Department of Public Health and Environment or local law enforcement agency. The failure to confiscate the copy of the application and document of the certified mail return receipt or to turn it over to the State Health Department or a state or local law enforcement agency within seventy-two hours after the confiscation shall not constitute a criminal offense."

*Note: Italicized areas indicate the purchasing parameters Centers must use in all sale transactions in which new patient paperwork is used. The Department of Revenue Medical Marijuana Enforcement Division has identified this as an area of emphasis in on-site audits and compliance checks.*